UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

PETER GHAVAMI
(aka PETER GHAVAMILAHIDJI),
GARY HEINZ, and
MICHAEL WELTY,

Defendants.

1:10-CR-01217 (KMW)

PROPOSED ORDER TO SEAL DOCUMENTS

THIS MATTER having been brought before the Court on Privilege Claimant 6's application for an entry of an Order to File Under Seal briefs and declarations in opposition to the United States Application for an Order to Disclose to Defendants Portions of Memoranda of Interview that Claimed to be Attorney-Client Privileged or Attorney Work Product, filed by the United States on March 15, 2012, and the Application of the United States for an Order Resolving Claims of Attorney-Client Privilege and Attorney Work Product as to Consensual Recordings, filed by the United States on January 19, 2012, and the Court having found that there are legitimate confidentiality concerns which warrant the relief sought, and for good cause shown, it is on this 31, day of May 2012.

ORDERED that the application to seal is GRANTED, and it is
ORDERED that briefs and declarations in support thereof, are scaled.

United States Magistrate Judge

5/31/12